

RECEIVED

FILE

EXHIBIT 1f.

AUG 29 2017

PLANNING BOARD
GRAFTON, MA

**BRIEF IN SUPPORT OF
APPLICATION FOR
SPECIAL PERMIT
WITH SITE PLAN REVIEW**

APPLICANT: Cellco Partnership d/b/a Verizon Wireless

SITE ADDRESS: 30 Grafton Common, Grafton, Massachusetts

ASSESSOR'S LOT I.D.: Map 74, Lot 124A

ZONING DISTRICT: Neighborhood Business and
Grafton Common Historic District

This brief in Support of an Application for a special permit with site plan review (*with all rights reserved*) and all other required relief pursuant to the Town of Grafton Zoning Bylaws, Massachusetts General Laws chapter 40A, and, the federal Telecommunications Act of 1996 for a concealed Wireless Communications Facility ("WCF") is respectfully submitted by Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless") to the Town of Grafton, Planning Board (the "Board").

I. DESCRIPTION OF APPLICANT

Verizon Wireless headquartered in Basking Ridge, N.J. is a leader in wireless voice and data services, the company:

- **Powerful technology.** The nation's largest and most reliable 4G LTE network. America's first nationwide 3G wireless broadband network. Verizon Wireless consistently delivers the most advanced wireless technology available.
- **Technology innovators.** Our innovative solutions are changing the mobile landscape, revolutionizing the way people interact with it and raising everyone's expectations of what it can be done. What seemed impossible yesterday is the way we live today. Imagine what we'll do tomorrow.
- **Change agents.** Our investment in people and commitment to technology drive positive change in the communities we serve. Through our core initiatives we work to improve the lives of domestic violence victims, prioritize accessibility and take steps to ensure a sustainable future.
- **Award winners.** The network. Technology. Innovation. Leadership. Corporate citizenship. Diversity. Customer care. We're proud to be recognized for those efforts as well as the privilege of improving the lives of the people and communities we serve.

II. APPLICANT'S INTEREST IN THE PROPERTY

YSC, Inc. ("Prime Lessee") and Verizon Wireless entered into a certain Lease Agreement by which Prime Lessee subleased to Verizon Wireless space within the steeple, building and on the ground and access/utility easement rights on a portion of the property located at 30 Grafton Common being shown on Tax Map of the Town of Grafton at Map 74, Lot 124A for the location of Verizon Wireless' antennas and space for its equipment.

See Exhibit 1, Letter of Authorization Property Owner.

See Exhibit 2, Letter of Authorization Prime Lessee.

III. PRIOR PERMITTING APPROVALS

On May 18, 2017, the Grafton Historic District Commission voted to grant Verizon Wireless a Certificate of Appropriateness for the installation of the concealed wireless communications facility at the Congregational Church of Grafton.

On August 17, 2017, the Grafton Historic District Commission voted to grant Verizon Wireless an amended Certificate of Appropriateness for the relocation of the ground equipment as an insubstantial change to the installation of the approved concealed wireless communications facility at the Congregational Church of Grafton.

IV. PROJECT DESCRIPTION

Verizon Wireless proposes the following regarding its proposal to locate antennas concealed within the steeple of the Congregational Church of Grafton, which will be enclosed behind replacement fiberglass panels of the steeple.

See Exhibit 3, Zoning Drawings.

See Exhibit 4, Color Photo Renditions of Existing and Proposed WCF.

A. The Proposed Antennas

Six (6) Panel Antennas with Remote Radio Heads

Verizon Wireless proposes to install six (6) antennas with twelve (12) remote radio heads and two (2) junction boxes concealed within the steeple of the church building with an antenna centerline of seventy point one feet (70.1') above ground level in the building located at 30 Grafton Common ("Building"). The panel antennas will be entirely enclosed within the steeple of the Building, which will require the installation of replacement fiberglass louvers that will result in no change to the exterior appearance of the steeple as they will be designed to match the existing louvers of the steeple of the Building. To provide 360 degrees of coverage, the panel antennas will be mounted in

three (3) separate sectors of two (2) antennas per sector with remote radio heads mounted below the antennas that will be concealed within the steeple.

Proposed antenna signal cables will be routed within the attic space on inside the Building, then within new vertical shafts (designed to match the appearance of existing Building façade) along outside face of Building and then underground within the yard to the fenced equipment area.

See Exhibit 5, Antenna Specifications.

B. The Proposed Equipment Space

The proposed ground space for the WCF is an area of approximately two hundred twelve point five (212.5) square feet [12'-6" wide x 17'-0" long], which will be located to the rear of the Building that will be surrounded by a nine (9) foot high white fence that will have a 4'-6" wide locked entrance gate.

The proposed ground space for the WCF will accommodate the area necessary to house the equipment, battery cabinets and back-up generator on a 10'-0" x 14'-0" (140 sf) concrete pad that will be covered by an overhead rain canopy above the proposed equipment. There will still be shrubs added to the landscape to provide a further visual screen for the fenced ground equipment. A small GPS antenna will be mounted to the proposed overhead canopy post for network connectivity and E911 compliance.

C. The Proposed location of the Emergency Generator

Verizon Wireless proposes to install a DC natural gas powered emergency generator that will be located within the fenced ground space area and will be used for back-up power only in the event of an emergency. The generator will be connected by power, control conduit and natural gas line, which will be connected to an outside gas meter (to be located within the vicinity of existing gas meter) along the existing stone wall.

Verizon Wireless will maintain the emergency generator. The emergency generator will be installed in an acoustically treated enclosure with further sound attenuation blankets (with overlapping seams) to be installed within fenced equipment area. The emergency generator will only be used for back-up power and only in the event of an emergency. The noise mitigation from the enclosure represents a substantial upgrade. An Environmental Noise Impact Assessment illustrating compliance with Federal, State and local standards is included with the application as an exhibit.

See Exhibit 6, Generator Specifications.

D. The Proposed Access and Utility Service

Access to the site is directly available via the property's frontage on Grafton Common. The site will be visited by Verizon Wireless personnel approximately once per month in a single service vehicle. There will be reinforced concrete stairs installed to allow for continued basement access to the Building.

Electric and telephone lines will be routed within ceiling space on the inside of the building and then underground to the equipment space. The generator will be connected by power, control conduit and natural gas line, which will be located outside the Building.

E. The Proposed Security, Signs and Lighting

A series of security measures are built into the facility to prevent accidental damage or vandalism: (a) the equipment area is locked, (b) the facility is equipped with a series of alarms which immediately notify the network alarm center of any equipment malfunction, and (c) prompt emergency response is available on a twenty-four (24) hour a day, seven (7) day a week basis.

There will be no signs, except for a required sign posted to the exterior of the fenced equipment area giving a phone number where the applicant can be reached on a twenty-four (24) hour basis and any other signs that may be required by applicable law or regulation governing Verizon Wireless' operation of the WCF. All signs shall be installed in a manner to comply with local requirements governing the installation of signage.

V. SATISFACTION OF PERMIT REVIEW STANDARDS

§1.5.5. Conditions for Granting Special Permits: Special Permits may be granted only for uses which are in harmony with the general purpose and intent of this By-Law. The special permit granting authority shall deny an application for a special permit when it determines that a nuisance, hazard, or congestion will be created, or for any other reason there will be substantial harm to the neighborhood or a derogation from the general purpose and the intent of the By-Law, or where the special permit is determined not to be in the public interest, or that the stated district objectives or applicable use criteria will not be satisfied. The special permit granting authority shall make findings on which to base its determination on the specific issues of:

- a. **Ingress and egress to property and proposed structures thereon with particular reference to automotive and pedestrian safety and convenience, traffic flow and control and access in case of fire or catastrophe.**

There will be no changes to driveways and driveway opening/entrances as a result of the installation of the proposed wireless communications facility. The proposed wireless communications facility

will be unmanned and generate only one or two site visits per month.

- b. Off-street parking and loading areas where required, with particular attention to the items in paragraph (a) above, and the economic, noise, glare, or odor effects of the special permit on adjoining properties and properties generally in the district.**

There will be no changes to the existing parking and loading spaces as a result of the installation of the proposed wireless communications facility. The Applicant will use the existing available parking for the one or two visits a month. The proposed installation will not be injurious, obnoxious, offensive, dangerous, or a nuisance to the community or the neighborhood through noise, vibration, concussion, odors, fumes, smoke, gases, dust, harmful fluids or substances, danger of fire or explosion or other objectionable feature detrimental to the community or neighborhood health, safety, convenience, morals or welfare. The proposed installation will not result in a discernable change to the existing church steeple and will not result in any impact to the integrity of adjoining districts nor will it be detrimental to health, morals or welfare.

- c. Refuse collection or disposal and services areas, with particular reference to items in paragraphs (a) and (b) above.**

The wireless communications facility will be unmanned. There will be no new refuse or other waste created as part of the installation or operation of the proposed wireless communications facility.

- d. Screening and buffering with reference to type, dimensions and character.**

The antennas will be located inside the steeple behind replacement louvers that will be designed to match the appearance of the existing louvers. The proposed ground space will be located to the rear of the Building that will be surrounded by an nine (9) foot high white fence that will have a 4'-6" wide locked entrance gate. There will be shrubs added to the landscape to provide a further visual screen for the fenced ground equipment.

- e. Signs, if any, and proposed exterior lighting with reference to glare, traffic safety, economic effect, and compatibility and harmony with properties in the district.**

No additional lighting is proposed as part of the Applicant's installation of a concealed wireless facility. As part of the proposed installation, Verizon Wireless' signage shall only be posted to comply with standards to provide notice of the installation of a wireless facility at the steeple access and area of screened ground equipment and will contain contact information.

The direct and indirect financial benefits to the Town of Grafton of reliable wireless service are indicative of the very nature of the use by the public and private sector. A wireless communications facility will promote the general welfare and thereby encourage business investment by providing a desirable and convenient service to current businesses. Verizon Wireless' proposal will also further benefit the public interest because wireless communications capabilities remain highly attractive to prospective residents and businesses.

It is a truism to state that, in today's competitive business environment, it is absolutely essential that there is the necessary infrastructure in a community to ensure access to reliable wireless services. The ability to travel away from the office, but still transact business by utilizing a mobile phone or other wireless device has become so interconnected that the absence of reliable service will certainly have a negative impact on the ability of a community to retain and attract business development.

Unlike many other proposed uses, the proposed facility at Grafton Common will not adversely impact the Town, for unlike a new business or residence, Verizon Wireless' use is passive. There will be no additional burden on municipal services, such as sewers, police, or fire protection. No additional foot traffic will occur, and only one or two vehicular visits per month are expected. In short, this is a use that may be implemented without increasing demands upon municipal services.

In a community with a highly educated and dynamic public and private sector, wireless service is absolutely essential to maintain and encourage responsible future development in the Town of Grafton. A wireless facility at 30 Grafton Common will provide the Town's residents and businesses with enhanced wireless service in the least disruptive manner possible and thus facilitate the financial benefits that will naturally follow from provision of such service.

f. Required yards and other open space; and

The Applicant's installation complies with all required yards and open space requirements in the Neighborhood Business Zoning District.

g. General compatibility with adjacent properties and other property in the district.

The proposed installation of the antennas inside the church steeple satisfies the requirements of § 5.8.3 Site Selection Preferences of the Town of Grafton, Zoning Bylaws. Section 3.2.3.1 provides that a Wireless Communications Facility is allowed in the Neighborhood Business zoning district and therefore may be installed upon issuance of a

Wireless Communications Facility is allowed in the Neighborhood Business zoning district and therefore may be installed upon issuance of a Special Permit by the Planning Board with Site Plan Review. Based on the description set forth herein, and as will be further demonstrated at the Public Hearing on this matter, the proposed concealed wireless communications facility meets the location, height and site requirements set forth in of the Town of Grafton, Zoning By-Laws for the grant of a Special Permit.

- h. There will not be any significant adverse impact on any public or private water supply.**

This requirement is not applicable for the proposed concealed facility inside the steeple with screened ground equipment.

- i. If the subject site is located within the Water Supply Protection Overlay District, there will not be any significant or cumulative impact upon municipal water supplies, and the Board shall give appropriate consideration to contamination by nitrate-nitrogen loading in making this determination.
(T.M. 10-28-86)**

The property is not located within the Water Supply Protection Overlay District.

- j. Protect important historic, cultural and scenic landscapes. (TM 10-18-99)**

On May 18, 2017, the Grafton Historic District Commission voted to grant Verizon Wireless a Certificate of Appropriateness and on August 17, 2017 voted to grant an amendment to the Certificate of Appropriateness for the installation of the concealed wireless communications facility at the Congregational Church of Grafton.

Based on the description set forth herein, and as will be further demonstrated at the meeting on this matter, the proposed installation of a concealed wireless communications facility meets the location, height and site requirements set forth in and Section 5.8 (Wireless Communications Facilities) of the Town of Grafton, Zoning By-Law.

§ 5.8.3 Site Selection Preferences

These regulations are written to indicate that the Town of Grafton preferences for facility locations are as follows, in descending order of preference:

- On existing structures such as buildings, communications towers, smokestacks, utility structures, etc.*
- In locations where existing topography, vegetation, buildings or other structures provide the greatest amount of screening*

- *On government or educational institution structures in the CB, OLI and I zoning districts*
- *On government or educational institution structures in the A or R40 zoning districts*
- *On government or educational institution structures in the R20, RMF or NB zoning districts*
- *On new towers in the A and R40 zoning districts*
- *On new towers in the R20, RMF and NB zoning districts*

Collocation is generally viewed as preferable to construction of a new support structure where it is assumed that collocation may often be less imposing. The Board's evaluation of each application is essential, however, and applicants are reminded that the preferences described in this section are intended as guidance for development of the application and for the Board's review but are not determining in any way.

Verizon Wireless's Site Selection Process: Verizon Wireless is committed to working with local communities in siting and construction of its wireless communication facilities. Because of Verizon Wireless' desire to be a good neighbor and establish long-term relationships, Verizon Wireless makes every effort to identify potential community concerns and incorporate all appropriate mitigation measures in the site selection process.

In this case, after a thorough review, Verizon Wireless has determined that the installation of a facility concealed inside the steeple is necessary to provide adequate coverage to those persons living in the Town of Grafton, as well as those persons commuting through the Grafton area. Following a thorough analysis, Verizon Wireless submits that it can fulfill its significant wireless service gaps by locating its equipment inside the steeple and consequently at this time a new separate telecommunications tower will not be required.

The wireless communications system being developed by Verizon Wireless has been designed utilizing sophisticated computer-engineering models which simultaneously evaluate topography, population patterns, and land use concerns to identify specific geographic regions to be serviced by the communications facility in the network. As a result, a limited search area is identified by the Radio Frequency Engineer as the necessary location for a transmission facility to ensure the most complete coverage to area residents, businesses and public safety officials. Once the search area has been selected, then Verizon Wireless' site selection consultant first seeks to identify existing structures. In this case, after a thorough review of the search area, Verizon Wireless has determined that the modified church steeple is sufficient for attachment purposes and therefore Verizon Wireless proposes to install an antenna array with a screened equipment area.

The proposed installation of the antennas inside the church steeple satisfies the requirements of § 5.8.3 Site Selection Preferences of the Town of Grafton, Zoning Bylaws. Section 3.2.3.1 provides that a Wireless Communications Facility is allowed in the Neighborhood Business zoning district and therefore may be installed upon issuance

of a Special Permit by the Planning Board with Site Plan Review. Based on the description set forth herein, and as will be further demonstrated at the Public Hearing on this matter, the proposed concealed wireless communications facility meets the location, height and site requirements set forth in of the Town of Grafton, Zoning By-Laws for the grant of a Special Permit.

§ 5.8.5 Conditions for Granting

In addition to the conditions for granting contained in Section 1.5.5 and all other applicable sections of this bylaw, the Planning Board shall make findings on which to base its determination on the specific issues of:

5.8.5.a) how well the use and proposal meet all required conditions and specifications of the bylaw;

As noted above in the commentary for § 5.8.3 and as stated elsewhere in this narrative, Verizon Wireless' proposed installation of a facility concealed inside the steeple with screened ground equipment has been designed to comply with the Town of Grafton Zoning By-Law, not only in regard to the siting preferences, but in regard to the conditions and specifications of the By-Law. Because of the nature of proposed concealed facility, there are several requirements of the By-Law that are seemingly inapplicable, and accordingly, the Applicant is formally requesting waivers to these requirements (Please see enclosed separate Request for Waiver Statement).

5.8.5.b) if the proposed facility is to be located in a residential zoning district, or within a distance equal to twice the height of the tower (from the ground to its highest point) but not less than 200 feet of a residential zoning district, whether the applicant has provided substantial evidence that the facility cannot, by technical necessity, feasibility be located in a non-residential zone.

The property is located in the Neighborhood Business Zoning District. This requirement is not applicable for the proposed concealed facility inside the steeple with screened ground equipment. The Applicant's proposed facility does not include the construction of a tower.

5.8.5.c) whether the proposal would sufficiently screen the facility from view, both through landscaping, placement and design, in order to minimize the visual appearance of the entire facility from areas within a one-thousand three hundred twenty foot (1,320') radius of the proposed facility location.

This requirement is not applicable for the proposed concealed facility inside the steeple with screened ground equipment. The Applicant's proposed facility does not include the construction of a tower.

5.8.5.d) whether the proposed facility will be housed within or upon a special structure, which will be architecturally compatible with the surrounding residential area (including, for example, bell tower or church steeple), or whether, by virtue of its design, no such special structure is required in order to minimize the visual impact within a one-quarter mile (1,320') radius. This provision applies to facilities in a residential (A, R40, R20, or RMF) zoning district, or within a distance equal to twice the height of the facility (from the ground to its highest point) but not less than three hundred feet (300'), from such zoning district.

The proposed installation of the antennas inside the church steeple with screened ground equipment satisfies the requirements.

§5.8.6 General Requirements

§5.8.6.1 Any principal part of the facility (excluding guy cables) shall be setback from the nearest property line by a distance of twice the height of the facility (as measured to its highest point, including antennae, etc.), or a distance of three hundred feet (300'), whichever is greater.

This requirement is not applicable for the proposed concealed facility inside the steeple with screened ground equipment. The Applicant's proposed facility does not include the construction of a tower.

§5.8.6.2 Any principal part of the facility (excluding guy cables) shall be setback from the nearest residential structure by a distance of twice the height of the facility (as measured to its highest point, including antennae, etc.), or a distance of three hundred feet (300'), whichever is greater.

This requirement is not applicable for the proposed concealed facility inside the steeple with screened ground equipment. The Applicant's proposed facility does not include the construction of a tower.

§5.8.6.3 No artificial lighting shall be installed unless required by the Federal Aviation Administration. If such lighting is required, it shall be screened so as not to project its light below the horizontal plane on which it is located.

No additional lighting is proposed as part of the Applicant's installation of a concealed wireless facility.

§5.8.6.4 A tower shall be of monopole or similarly unimposing design. In the event other than a monopole is proposed, the Board will view a guyed pole more favorably than a broad lattice type or similar structure. The applicant shall successfully demonstrate to the satisfaction of the Board that the proposed facility will have minimal visual impact.

The Applicant is not proposing to construct a new tower.

§ 5.8.6.5 To minimize the number of wireless communications facility sites in the community in the future, the proposed facility shall be designed and constructed so it is reasonably capable of accommodating other users, including other wireless communications companies and local police, fire and ambulance companies, unless it is determined to be technically infeasible based on the Board's evaluation of information submitted.

This requirement is not applicable for the proposed concealed facility inside the steeple with screened ground equipment. The Applicant's proposed facility does not include the construction of a tower.

§ 5.8.6.6 No interference to existing television, cable television or radio signals, including emergency systems and public safety communications, shall be permitted from the tower or components thereon. If interference occurs, it shall be the responsibility of the site owner to immediately remedy it.

Verizon Wireless operates in compliance with all of the rules and regulations promulgated by the Federal Communications Commission as required by its licensing.

§ 5.8.6.7 Unless otherwise required by the Federal Communications Commission or the Federal Aviation Administration, tower facilities shall be painted non-contrasting grey or blue in color, or camouflaged with some treatment deemed acceptable by the Board. Antenna(e) shall be non-contrasting or camouflaged.

The Applicant is not proposing to construct a new tower, but rather concealed antennas inside the steeple with screened ground equipment.

§ 5.8.6.8 The related unmanned equipment and/or other buildings shall not be more than twelve (12) feet in height. All ancillary uses (including, for example, but not limited to, a maintenance depot, vehicle storage, etc.) are prohibited.

The proposed installation of the screened ground equipment satisfies the requirement.

§ 5.8.6.9 All utilities proposed to serve the facility shall be installed underground.

The proposed utility connections for electric, Telco and natural gas will be underground. Electric and telephone lines will be routed within ceiling space on the inside of the building and then underground to the equipment space. The generator will be connected by power, control conduit and natural gas line, which will be located outside the Building.

§5.8.6.10 Dish antennae shall be no more than six (6) feet in diameter, and shall be mesh (rather than solid). Panel antennae shall be no more than five (5) feet in height.

The Applicant is not proposing to install any dish antennas. The Applicant's antennas will be concealed inside the steeple and will not exceed 5 feet in height.

§5.8.6.11 No advertising or signage shall be permitted on the facility.

As part of the proposed installation, Verizon Wireless' signage shall only be posted to comply with standards to provide notice of the installation of a wireless facility at the steeple access and area of screened ground equipment and will contain contact information.

§5.8.6.12 No facility shall be located within a distance equal to twice the height of the facility (as measured from the ground to its highest point) plus four hundred feet (400') of a wellhead area of a municipal water supply.

This requirement is not applicable for the proposed concealed facility inside the steeple with screened ground equipment. The Applicant's proposed facility does not include the construction of a tower.

§5.8.6.13 Landscaping shall be provided around the base of the facility, adjacent to a security fence at least six feet (6') in height. The landscaping shall consist of a planting strip at least 25 feet wide, with ground cover and/or grass, and shall include at least one row of six-foot (6') high evergreen trees adjacent or proximate to the fence, and a row of deciduous trees at least ten feet (10') in height and at least one-and-one-half-inch (1 ½") caliper planted no more than 20 feet apart on center, and deemed acceptable by the Board. Applicants may substitute alternative landscape plans that meet the purposes of this subsection to limit the visual impact of the lower portion of the tower and adjoining accessory facilities for the Board's consideration.

There will be shrubs added to the landscape to provide a further visual screen for the fenced ground equipment.

§5.8.7 Although not an accessory use as defined by the bylaw, a wireless communications facility may be sited on a lot which already accommodates a lawful principle use. Due consideration will be given to the overall functioning of the lot, with particular respect to the items in Section 1.5.5 and 5.8.5 and other applicable sections of this bylaw, during the Board's review of the special permit application.

The proposed installation of the antennas inside the church steeple with screened ground equipment satisfies the requirements.

§ 5.8.8 Any alteration or expansion of the facility or structure or the uses it supports (including the size, number or color of antennae or other components) shall require a modified special permit, applied for in accordance with all regulations applicable at the time such application is properly made.

To the extent not preempted or otherwise inapplicable, the Applicant shall comply with this requirement.

§ 5.8.9 If the facility is abandoned or no longer operable, it shall be removed within six (6) months of its abandonment.

In compliance with Section 5.8.9 of the Town of Grafton, Zoning By-Law, Verizon Wireless will remove the wireless communications facility within six (6) months of its abandonment.

§ 5.8.10 The Planning Board may, by a vote of at least 4 members, each of whom is eligible to participate in the special permit vote, authorize deviation from strict compliance with the provisions of this Section 5.8 where such deviation is in furtherance of the purposes and intents of the bylaw, and where such authorized deviation is expressly enumerated, justified and acted upon by the Planning Board.

Pursuant to this Section, the Applicant formally requests waivers in the separate Request for Waiver Statement.

§5.8.11 Separability: The invalidity of any section or provision of this bylaw shall not invalidate any other section or provision herein.

This Section is not relevant to the Applicant's application materials, but rather speaks in regard to hypothetical future court interpretation of the Zoning By-Law.

Satisfaction Special Permit Requirements: The proposed installation will generate no additional traffic or other negative impacts on surrounding properties or the Town of Grafton. The WCF will require no water or sewer services. There will be no changes to the utilities that will continued to be obtained from existing service in a manner consistent with current power, gas and telephone services. The WCF will be unoccupied with no employees or customers. A Verizon Wireless technician in a standard sport-utility type vehicle will service the equipment at the WCF approximately once a month.

A gap in coverage is evidenced by the inability to adequately transmit or to receive a wireless signal, or by the interruption or disconnection of a wireless signal. Verizon Wireless currently has a significant gap in wireless capacity and coverage in the Town of Grafton. The gap that exists in the Town prevents Verizon Wireless from providing uninterrupted wireless service to current and future public and private users of its wireless communications system.

The location of a facility concealed inside the steeple is an integral part of Verizon Wireless' network of telecommunications facilities necessary to provide adequate coverage to those persons living in the Town of Grafton, as well as those persons commuting through the Grafton area on the various State and/or Federal highways. Following a thorough analysis, Verizon Wireless submits that it can fulfill its significant wireless service gaps by locating its equipment inside the steeple and consequently at this time a new separate telecommunications tower will not be required.

If Verizon Wireless is permitted to install the equipment detailed herein, this facility will aid in reaching Verizon Wireless' goal to provide enhanced wireless service and communications in the Town of Grafton, the Commonwealth of Massachusetts and the United States as a whole.

See Exhibit 7, Radio Frequency Engineer Report and Coverage Maps.

The proposed installation will not be injurious, obnoxious, offensive, dangerous, or a nuisance to the community or the neighborhood through noise, vibration, concussion, odors, fumes, smoke, gases, dust, harmful fluids or substances, danger of fire or explosion or other objectionable feature detrimental to the community or neighborhood health, safety, convenience, morals or welfare. The proposed installation will not result in a discernable change to the existing church steeple and will not result in any impact to the integrity of adjoining districts nor will it be detrimental to health, morals or welfare.

See Exhibit 8, Environmental Sound Assessment.

The facility will be operated in compliance with all applicable federal and state regulations, including regulations governing radio frequency emissions.

Verizon Wireless is in compliance with federal and state regulations to ensure that its wireless telecommunications facilities are operating in compliance with all applicable standards and mandates.

See Exhibit 9, RF Exposure Guidelines for Verizon Wireless.

See Exhibit 10, FCC Licenses.

The wireless communications facility is regularly maintained by qualified technicians to assure that the equipment operates at optimal condition. A series of security measures are built into the facility to prevent accidental damage or vandalism: (a) the antennas are enclosed within a building, (b) the ground equipment is installed within a locked fenced area, (c) the facility is equipped with a series of alarms which immediately notify the network alarm center of any equipment malfunction, and (d) prompt emergency response is available on a twenty-four (24) hour a day, seven (7) day a week basis.

Summarizing, the installation will consist of six (6) antennas with twelve (12) remote radio heads and two (2) junction boxes concealed within the steeple of the church building. The proposed ground space for the WCF will accommodate the area necessary to house the equipment, battery cabinets and back-up generator on a 10'-0" x 14'-0" (140 sf) concrete pad. There will be no accessory facilities and the WCF will be unmanned and will only require that a Verizon Wireless technician in a standard sport-utility type vehicle service the equipment at the WCF approximately once a month. Verizon Wireless will continue to utilize the existing access and parking for the church. The installation of the concealed antennas inside the steeple with screen ground equipment will not materially alter the appearance of the property.

VI. COMPLIANCE WITH TELECOMMUNICATIONS ACT OF 1996

Because Verizon Wireless is applying for zoning approval for the installation of equipment that provides wireless services, the application is subject to §704 of the federal Telecommunications Act of 1996 ("TCA"), codified at 47 U.S.C. §332(c)(7)(B). By way of background, the TCA is a federal law enacted in 1996 whose purpose is "[t]o promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies."¹ To further this purpose, the TCA established national standards that apply to zoning applications for wireless facilities. These standards preempt inconsistent state and local laws, so they must be considered by zoning boards in making decisions on applications for wireless facilities.

VII. CONCLUSION

The availability of wireless communications service enhances community safety, and is increasingly relied upon by civil defense and other safety officers as well as the general public in times of crisis, natural disaster, bad storms or similar circumstances. Wireless communications service also provides a convenience to residents, and is an attractive feature and service to businesses. The proposed installation, by providing these services, will promote the health, safety, convenience and general welfare of the inhabitants of the Town of Grafton.

The proposed installation meets all of the standards for a special permit with site plan review (*with all rights reserved*) pursuant to the Town's Zoning Bylaws. The subject parcel is located within the Neighborhood Business zoning district and Verizon Wireless proposes to install a concealed facility. The installation will have minimal impact on the community and will comply with all applicable laws and regulations. The Applicant therefore requests that the Board grant its application for a special permit with site plan review and any waivers requested.

¹ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56 (1996).